

# **ATTACHMENT 7**

## **PLAINTIFF'S NOTICE OF FILING IN SUPPORT OF MEMORANDUM OF LAW ON POST-TRIAL MOTIONS**

**From:** [Katarina Resar Krasulova](#)  
**To:** [Rakoff NYSD Chambers](#); [Ken Turkel](#); [schulzd@ballardspahr.com](#); [brownjay@ballardspahr.com](#); [Shane Vogt](#); [O'Laughlin, Andy](#); [axelrodd@ballardspahr.com](#); [Ellsworth, Felicia H](#); [schellj@ballardspahr.com](#); [Gayla Arnold](#); [David Hayes](#)  
**Subject:** Palin v. The New York Times Company, 17-cv-04853  
**Date:** Monday, April 21, 2025 7:02:05 AM

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Dear Counsel,

The draft charge sent to you last night assumed arguendo that all five elements of plaintiff's claim of libel were still in legitimate dispute at this time. However, at the charging conference, if not earlier, the Court will hear argument as to whether this is really so. This might lead, for example, to a revision of the overall description of plaintiff's claim to read something like this:

***A libelous statement is an intentionally false and defamatory statement about a person. Here, the Times admitted shortly after the editorial was published that it contained two untrue statements of fact [quote the corrections]. However, only the first of these two statements is the subject of Ms. Palin's libel claim. As to that statement, the remaining disputes are first, whether at the time the editorial was published the ordinary reader would have regarded the statement as being about Ms. Palin personally, and, second, whether when Mr. Bennet drafted the challenged version of the editorial, he either knew this statement was false or purposely disregarded the high probability that it was false. [The instructions would then go on to discuss just these two contested elements.]***

Sincerely,

Katarina

**Katarina Resar Krasulova**

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